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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION

MDL No. 2843
Case No. 18-md-02843-VC-JSC

This document relates to:

ALL ACTIONS

**PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED**

Judge: Hon. Vince Chhabria and
Hon. Jacqueline Scott Corley
Courtroom: 4, 17th Floor

Pursuant to Civil Local Rules 79-5 and 7-11 and the Stipulated Protective Order entered by the Court on August 17, 2018 (Dkt. No. 122), the Consolidated Plaintiffs (“Plaintiffs”) hereby submit this Administrative Motion to Consider Whether Another Party’s Material Should be Sealed for the following Documents:

	Document	Portions Sought to be Sealed
1	Transcript from December 4, 2021 Special Master hearing regarding ADI-related documents	Sought to be sealed in its entirety
2	Plaintiffs’ presentation materials from December 4, 2021 Special Master hearing regarding ADI-related documents	Sought to be sealed in its entirety
3	Defendant’s presentation materials from December 4, 2021 Special Master hearing regarding ADI-related documents	Sought to be sealed in its entirety

The above-listed documents contain, reference, or summarize materials designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order entered in this action. Pursuant to Local Rule 79- 5(f)(3), Defendant, as the Designating Party, bears the responsibility to establish that all of the designated material is sealable.

Pursuant to Civil Local Rule 79-5(f), the following attachments accompany this motion:

- (1) An unredacted version of Transcript from the December 4, 2021 Special Master’s Hearing regarding production of ADI related documents. A redacted version is not provided as Plaintiffs seek to file the entirety of this document under seal.
- (2) Plaintiffs’ presentation materials from the December 4, 2021 Special Master hearing regarding production of ADI related documents. A redacted version is not provided as Plaintiffs seek to file the entirety of this document under seal.

(3) Defendant's presentation materials from December 4, 2021 Special Master hearing regarding production of ADI related documents. A redacted version is not provided as Plaintiffs seek to file the entirety of this document under seal.

Plaintiffs have conferred with Facebook and has indicated that it does not oppose this filing.

In light of the foregoing, Plaintiffs respectfully submit this pleading in connection with the filings referenced above.

Dated: January 7, 2022

Respectfully submitted,

KELLER ROHRBACK L.L.P.

BLEICHMAR FONTI & AULD LLP

By: /s/ Derek W. Loeser
Derek W. Loeser

By: /s/ Lesley E. Weaver
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Plaintiffs' Co-Lead Counsel

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)

I, Derek W. Loeser, attest that concurrence in the filing of this document has been obtained from the other signatory. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 7th day of January, 2022, at Seattle, Washington.

/s/ Derek W. Loeser

Derek W. Loeser